

February 22, 2010

VIA ELECTRONIC FILING

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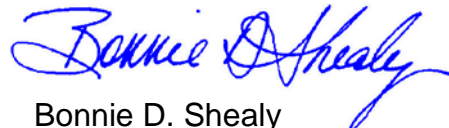
Re: Global Connection Inc. of America – South Carolina ETC Application

Dear Jocelyn:

Enclosed for filing please find the application of Global Connection Inc. of America for designation as an eligible telecommunications carrier. By copy of this letter we are providing the Office of Regulatory Staff with a copy of the application. Should you have any questions, please contact me.

Very truly yours,

ROBINSON, MCFADDEN & MOORE, P.C.



Bonnie D. Shealy

/bds
Enclosures

cc/enc: Dan F. Arnett, Chief of Staff of ORS (via email & U.S. Mail)
Nanette Edwards, Esquire (via email)
Mr. Carey Roesel (via email)
Mr. Neil Savignano (via email)

**BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA**

GLOBAL CONNECTION INC. OF AMERICA)

Docket No. _____

)
Application for Designation as an Eligible)
Telecommunications Carrier for Purposes Of)
Receiving Federal Universal Service Support)
Pursuant to Section 214(e)(2) of the)
Telecommunications Act of 1996.)

**GLOBAL CONNECTION INC. OF AMERICA
APPLICATION FOR DESIGNATION AS AN
ELIGIBLE TELECOMMUNICATIONS CARRIER**

Global Connection Inc. of America (“Global Connection” or “Applicant”), pursuant to the Telecommunications Act of 1996, 47 U.S.C. §214(e)(2) (the “Act”), the rules of the Federal Communications Commission (“FCC”) 47 C.F.R. §54.201, 26 S.C. Code Regs. 103-690 (Supp. 2008) and the other applicable rules and regulations of the Public Service Commission of South Carolina (“Commission”) hereby requests that the Commission designate Global Connection as a telecommunications carrier eligible under the provisions of Section 54.201(d) to receive federal universal service support. The Applicant is seeking low income support in the non-rural areas of the State of South Carolina.

1. Section 214(e)(2) of the Act provides that a state Commission may, upon its own motion, or upon request, designate a common carrier to be an “eligible telecommunications carrier” for purposes of receiving universal service support under the Act. Section 214(e)(2) also requires that the carrier designated meet the requirements of Section 214(e)(1). Section 214(e)(1) states:

A common carrier designated as an eligible telecommunications carrier... shall be eligible to receive universal service support in accordance with section 254 and shall, throughout the service area for which the designation

is received –

(A) offer the services that are supported by the Federal universal service support mechanism under section 254(c), either using its own facilities or a combination of its own facilities and resale of another carrier's services (including the service offered by another eligible telecommunications carrier); and

(B) advertise the availability of such services and the charges therefore using a media of general distribution.

2. With regard to non-rural telephone companies, Section 214(c)(5) of the Act and C.F.R. Section 54.207 define the term “service area” to be a “geographic area established by a state commission for the purpose of determining universal service obligations and support mechanisms.” For the purpose of this application, the minimum geographic area that an applicant must serve to be designated as an ETC will be assumed to be an exchange.

3. This Petition establishes that Global Connection meets the two criteria set forth in Section 214(e)(1). It also identifies the “service area” that Global Connection requests the Commission establish for purposes of Global Connection receiving, low income funding assistance.

Background

4. Global Connection is a Competitive Local Exchange Carrier ("CLEC") authorized by the Commission to provide local exchange service within the State of South Carolina. The Commission granted Global Connection Inc. of America¹ a certificate of public convenience and necessity to provide local exchange service on July 19, 2000, in Order No. 2000-580, Docket No. 2000-149-C, and amended the certification order on January 25, 2002, to reflect that the Applicant would also provide service using an unbundled network elements platform (“UNE-P”)

¹ The Commission approved the company's request to change its name from Global Connection of South Carolina, Inc. to Global Connection Inc. of America on August 26, 2008, in Order No. 2008-598.

in Order No. 2002-58. Global Connection also provides additional telecommunications services, and has plans to begin offering resold wireless services.

Global Connection currently provides basic local exchange service in the State of South Carolina. Global Connection offers the supported services either through the lease of switched port/loop combinations ("UNEs") or through a combination of leased services and resale. Global Connection has plans to deploy its own local switch. Global Connection is properly registered with the FCC to provide telecommunications services under 47 CFR § 64.1 195.

5. Global Connection's street address and principal place of business is 5555 Oakbrook Parkway, Suite 620, Norcross, GA 30093. Global Connection's telephone number is 678-741-6200.

6. All correspondence, communications, pleadings, notices, orders and decisions relating to this Application should be addressed to:

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With a copy to its local counsel

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7. Under 214(e)(1) of the Act, a telecommunications carrier may be designated as an ETC and thereby receive universal service support so long as the carrier, throughout its service

areas: (a) offers the services that are supported by federal universal service support mechanisms under §254(c) of the Act, either using its own facilities or a combination of its own facilities and those of another carriers (including services offered by another ETC); and (b) advertises the availability of and charges for such services using media of general distribution. Section 54.201(b) of the FCC's Rules states that the Commission shall, on its own motion or upon request, designate a common carrier an ETC so long as the carrier meets the requirements of Section 54.201(d), which restates the requirements found in §214(e)(1) of the Act. Section 214(e)(2) of the Act and Section 54.201(c) of the FCC's Rules state that the Commission may, in the case of an area serviced by a rural telephone company, and shall, in the case of all other areas, designate more than one common carrier as an ETC for a service area the Commission designates, provided each additional requesting carrier satisfies 214(e)(1) of the Act and Section 54.201(d) of the FCC's Rules. Before designating an additional ETC for an area serviced by a rural telephone company, the Commission shall find that such designation is in the public interest.

Global Connection Provides the Core Services Required to Qualify for Universal Service Support

8. Pursuant to Section 54.101(a) of the FCC's Rules, the following core services and functions are to be offered by an ETC and should be supported by federal universal support mechanisms:

- a) Voice grade access to the public switched network. "Voice grade access" is defined as a functionality that enables a user of telecommunications services to transmit voice communications, including signaling the network that the caller wishes to place a call, and to receive voice communications, including receiving a signal indicating there is an incoming call. For the purposes of this part, bandwidth for voice grade access should be, at a minimum, 300 to 3,000 Hertz;
- b) Local usage. "Local usage" means an amount of minutes of use of exchange service, prescribed by the FCC, provided free of charge to end users;

- c) Dual tone multi-frequency signaling or its functional equivalent. "Dual tone multi-frequency" (DTMF) is a method of signaling that facilitates the transportation of signaling through the network, shortening call set-up time;
- d) Single-party service or its functional equivalent. "Single-party service" is telecommunications service that permits users to have exclusive use of a wireline subscriber loop or access line for each call placed, or, in the case of wireless telecommunications carriers, which use spectrum shared among users to provide service, a dedicated message path for the length of a user's particular transmission;
- e) Access to emergency services. "Access to emergency services" includes access to services, such as 911 and enhanced 911, provided by local governments or other public safety organizations. 911 is defined as a service that permits a telecommunications user, by dialing the three-digit code "911" to call emergency services through a Public Service Access Point (PSAP) operated by the local government. "Enhanced 911" is defined as 911 service that includes the ability to provide automatic numbering information (ANI), which enables the PSAP to call back if the call is disconnected, and automatic location information (AH), which permits emergency service providers to identify the geographic location of the calling party. "Access to emergency services" includes access to 911 and enhanced 911 services to the extent the local government in an eligible carrier's service area has implemented 911 or enhanced 911 systems;
- f) Access to operator services. "Access to operator services" is defined as access to any automatic or live assistance to a consumer to arrange for billing or completion, or both, of a telephone call;
- g) Access to interexchange service. "Access to interexchange service" is defined as the use of the loop, as well as that portion of the switch that is paid for by the end user, or the functional equivalent of these network elements in the case of a wireless carrier, necessary to access an interexchange carrier's network;
- h) Access to directory assistance. "Access to directory assistance" is defined as access to a service that includes, but is not limited to, making available to customers, upon request, information contained in directory listings; and
- i) Toll limitation for qualifying low-income consumers.

9. Global Connection offers all of the supported services enumerated under Section 254(c) using its own facilities or those obtained from other carriers. Accordingly, the Company satisfies the requirement set forth in Section 214(e)(1)(A). Upon designation as an ETC, Global Connection will participate in, and offer, LifeLine and Link-Up programs to qualifying low-

income consumers and publicize the availability of Lifeline and Link-Up services in a manner reasonably designed to reach those likely to qualify for those services.

Global Connection Satisfies the Requirements of the FCC's ETC Order

10. On March 17, 2005, FCC 05-46 ("FCC ETC Order") was released. In that order, the FCC urged that the new procedures it contained serve as guidelines for state commissions to follow in their evaluation of ETC applications before those commissions. State commissions, however, are not bound by the guidelines in the FCC ETC Order when they evaluate ETC applications.

11. The guidelines in the FCC ETC Order generally require that the ETC applicant must demonstrate (1) a commitment and ability to provide services, including providing service to all customers within its proposed service area; (2) how it will remain functional in emergency situations; (3) that it will satisfy consumer protection and service quality standards; (4) that it offers local usage comparable to that offered by the incumbent LEC; and (5) an understanding that it may be required to provide equal access if all other ETCs in the designated service area relinquish their designations pursuant to section 214(e)(4) of the Act.

12. More specifically, the guidelines in the FCC ETC Order require the following:

- a) An ETC Applicant shall commit to provide service throughout its proposed designated service area to all customers who make a reasonable request for service. If the ETC's network already passes or covers the potential customer's premises, the ETC should provide service immediately. In those instances where a request comes from a potential customer within the applicant's licensed service area but outside its existing network coverage, the ETC applicant should provide service within a reasonable period of time if service can be provided at reasonable cost. If an ETC applicant determines that it cannot serve the customer at reasonable cost, then the ETC must report the unfulfilled request to the Commission within 30 days after making such determination.
- b) An ETC Applicant shall submit a five-year plan that describes with specificity proposed improvements or upgrades to the applicant's network

on a wire center-by-wire center basis throughout its proposed designated service area.

- c) An ETC Applicant shall demonstrate its ability to remain functional in emergency situations. Specifically, in order to be designated as an ETC, an applicant must demonstrate it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations.
- d) An ETC Applicant shall demonstrate that it will satisfy appropriate consumer protection and service quality standards.
- e) An ETC Applicant shall demonstrate that it offers a local usage plan comparable to the one offered by the incumbent LEC in the service areas for which it seeks designation.
- f) An ETC Applicant shall certify that the carrier acknowledges that the FCC may require it to provide equal access to long distance carriers if all other ETCs withdraw from the market.

Applicant's Commitment to Provide Service Throughout Its ETC Designated Area

13. Global Connection has served and will continue to serve the exchanges where it leases UNEs or resells the services of the non-rural telephone companies in the designated service area. Global Connection does not seek designation as an ETC in any areas served by rural telephone companies. Pursuant to 26 S.C. Code Regs. 103-690(C)(a)(1)(A) the Applicant hereby makes a commitment to provide service throughout its proposed ETC designated service area to all customers who make a reasonable request for service. If Applicant's network already passes or covers the potential customer's premises, Applicant will provide service immediately. For those instances where a request comes from a potential customer within Applicant's proposed ETC Designated Area but outside its existing network coverage, Applicant will provide service within a reasonable period of time if service can be provided at a reasonable cost utilizing one or more of the following methods: (1) modifying or replacing the requesting customer's equipment; (2) deploying a roof-mounted antenna or other equipment; (3) adjusting network or customer facilities; or (4) reselling services from another carrier's facilities to provide service. If

Applicant determines that it cannot serve the customer using one or more of these methods, then it will report the unfulfilled request to the Commission within 30 days after making such determination.

Applicant's Five Year Network Improvement Plan

14. Under FCC guidelines, an ETC Applicant must submit a five-year plan that describes with specificity proposed improvement or upgrades to the applicant's network on a wire center by wire center basis throughout its proposed designated service area. The only circumstance warranting deviation from this requirement is where an applicant's requested ETC serving territory would qualify it to receive no "high cost" USF support, but only "low income" USF support. Because Global Connection seeks the ETC designation solely for purposes of reimbursement for the provision of subsidized Lifeline and Link-Up services to eligible customers, submission of a Five Year Network Improvement Plan is not required at this time.

Applicant's Ability to Remain Functional in Emergency Situations

15. As required by 26 S.C. Code Reg. 103-690(C)(a)(2), Applicant has the ability to remain functional in emergency situations. Applicant has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations.

16. Applicant's entire network is monitored to check for proper operations at all times. Applicant has technicians on call 24 hours per day and 7 days a week. Applicant also stocks a full complement of spare parts for all network components.

Applicant's Commitment on Consumer Protection and Service Quality Standards

17. Applicant will satisfy appropriate consumer protection and service quality standards. Applicant has existing customer care programs that demonstrate its commitment to quality service. As part of the requirements for providing local exchange services, Global Connection is required to abide by and satisfy all service quality and consumer protection rules under 26 S.C. Code Regs. 103-690(C)(a)(3), including filing of quality of service reports with the Commission. In addition, Applicant commits to satisfying all such applicable state and federal requirements related to consumer protection and service quality standards.

Applicant's Comparable Local Usage/Rate Plans

18. Applicant offers local usage plans comparable to the service plans offered by the incumbent LECs in the wire centers for which it seeks ETC designation pursuant to 26 S.C. Code Regs. 103-690(C)(a)(4).

19. Applicant acknowledges that Section 54.405 of the FCC's Rules requires all ETCs to make Lifeline services (as defined in Section 54.401 of the FCC's Rules) available to qualifying low-income consumers. Applicant commits to make Lifeline and Link-up service available for qualified customers. Applicant will charge a reduced or zero activation fee to Linkup eligible subscribers. With respect to Lifeline-eligible subscribers, Applicant commits to offer a service plan to provide a low-cost service option comparable in price to that offered by the ILEC.

Applicant's Commitment to Advertise Supported Service and Two Year Advertising Plan

20. Global Connection's advertising will conform to rules adopted by this Commission. Pursuant to 26 S.C. Code Regs. 103-690(C)(1)(C) Global Connection's two year plan describing its plans for advertising and outreach programs for identifying, qualifying and

enrolling eligible participants in the Lifeline and Link Up programs is attached as **Exhibit 1**. The Applicant's lifeline tariff revisions are attached as **Exhibit 2**. Specifically, Global Connection will advertise the general availability of, and charges for, the supported services listed above to all telecommunications customers in the specified geographic area on a quarterly basis. It will place those advertisements in a media of general distribution to include direct mail, television and radio ads, and Internet that targets the residential customer. In addition, if the Commission so requests, Global Connection will provide proof of its advertising practices to the Commission. With regard to the availability of low-income services, Global Connection will also advertise in accordance with the Commission's rules. Finally, Global Connection is willing to provide written notification of universal service programs to the directors of municipal, State and federal governmental agencies within Global Connection's service territory whose clientele is likely to benefit from the program.

Applicant's Commitment on Carrier of Last Resort Equal Access Requirement

21. Applicant acknowledges that the FCC may require it to provide equal access to long distance carriers if all other ETCs withdraw from the market.

22. Applicant commits to make equal access available to allow a subscriber that elects to pay its own toll charges to pre-select its long distance carrier for all toll calls which the customer originates if the ILEC in a wire center within its proposed ETC designated service area drops its ETC designation.

Global Connection's Proposed ETC Service Area

23. Global Connection is not a "rural telephone company" as that term is defined by §153(37) of the Act. Under Section 54.207(a) of the FCC's Rules, a "service area" is a "geographic area" established by a state commission for the purpose of determining universal

service obligations and support mechanisms.” Global Connection’s proposed service area includes all of the non-rural telephone company service areas in South Carolina; namely AT&T, Verizon, Embarq, and Windstream. For non-rural service areas, there are no restrictions on how a state commission defines the “service area” for purposes of designating a competitive ETC. Therefore the Commission may designate Applicant as an ETC in all of the wire centers of the above-mentioned ILECs as shown on **Exhibit 3**.

For these service areas, Global Connection presently only seeks Low Income support through the Lifeline and Link-Up programs.

ETC Designation for Global Connection Will Serve the Public Interest

24. Global Connection acknowledges that Section 54.405 of the FCC’s Rules requires all ETC’s to make Lifeline services (as defined in Section 54.401 of the FCC’s Rules) available to qualifying low-income consumers. Lifeline services are available to qualifying low-income consumers in its service areas. Global Connection will advertise telecommunications services as an ETC where it provides service in its designated service area in South Carolina and will publicize the availability of Lifeline and Link-Up services in a manner reasonably designed to reach those likely to qualify for those services. Indeed, designation of Global Connection as an ETC would also allow Lifeline and Link-up service to be available to Global Connection’s customers thereby offering telecommunications to a market that often is limited in services and selection. Since Lifeline support is designed to reduce the monthly cost of telecommunications services for eligible consumers and is distributed on a per-customer basis that is reflected in the price the eligible customer pays, it is assured that all support received by the carrier is used to provide Lifeline services to consumers which promotes the availability of telephone service to low income users which is clearly in the public interest.

27. Global Connection is a contributor to, and in good standing with, the Universal

Service Fund and does not have any annual reports or assessment fees that are overdue.

28. By this application, Global Connection asserts its willingness and ability to comply with all the Commission's ETC rules and regulations. Applicant has limited its requested USF support to the federal USF low income support program. Additionally, Applicant certifies that all low income USF funding it receives will be used to provide a credit to its Lifeline and Link-up eligible customers consistent with 47 CFR 54.403.

Global Connection agrees to use the same qualifying criteria for Lifeline and Link-Up as is offered in AT&T territory. The Applicant will provide Lifeline customers an additional \$3.50 credit in order that the federal matching funds can be maximized. This will result in a Lifeline credit of \$13.50 per month which is consistent with the credit offered throughout the non-rural carriers' service areas.

Applicant agrees to include in its quarterly Service Quality Report the number and justification of applications held for more than 30 days and the number and justification of applications that were denied. Global Connection will only seek direct low income support from the federal USF for those lines provided through the use of its own facilities or through a combination of its own facilities and the leased facilities of another carrier. Applicant also agrees to report quarterly the percentage of consumers offered Lifeline via resale versus commercial agreements.

Applicant agrees to abide by all advertising and reporting and verification requirements established by the FCC and Commission.

Should Global Connection seek designation as an ETC for high cost support, the Company will file an additional and separate application that addresses all applicable state and federal laws, rules and regulations.

Pursuant to 26 S.C. Code Regs. 103-690(C)(a)(5) through (7), Applicant attaches an

Affidavit of Certification signed by an officer of Global Connection that is attached as **Exhibit 4**.

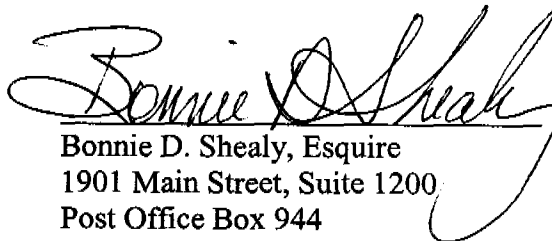
Conclusion

WHEREFORE, on the basis of the foregoing, Global Connection respectfully requests that the Commission designate Global Connection as a telecommunications carrier eligible under the provisions of Section 54.201(d) of the FCC's Rules to receive federal universal service fund low income support to be used to subsidize rates for its Lifeline and Link-Up customers; And grant other relief as it deems necessary.

DATED this 22nd day of February, 2010.

Respectfully submitted,

Robinson, McFadden & Moore, P.C.

A handwritten signature in black ink, appearing to read "Bonnie D. Shealy", is written over a horizontal line.

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Attorneys for Global Connection Inc. of America

**BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA**

GLOBAL CONNECTION INC. OF AMERICA)
)
 Application for Designation as an Eligible)
 Telecommunications Carrier for Purposes Of)
 Receiving Federal Universal Service Support)
 Pursuant to Section 214(e)(2) of the)
 Telecommunications Act of 1996.)

EXHIBIT 1

TWO YEAR ADVERTISING PLAN

LIFELINE AND LINK UP
ADVERTISING AND OUTREACH PLAN
OF
GLOBAL CONNECTION, INC. OF AMERICA
FOR THE STATE OF SOUTH CAROLINA

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SUMMARY

Global Connection, Inc. of America has developed this Advertising Plan (the “Plan”) in compliance with Chapter 103-690 of the South Carolina Code of Regulations (Unannotated), which requires carriers who are “seeking ETC designation for the purposes of participation in the Lifeline and Link Up programs” to “submit a two-year plan that describes the carrier’s plans for advertising and outreach programs for identifying, qualifying, and enrolling eligible participants in the lifeline and Link Up programs”. In accordance with state and federal requirements, Global Connection will “Publicize the availability of Lifeline service in a manner reasonable designed to reach those likely to qualify for the service”¹.

Implementation of the Company’s Advertising Plan will commence upon designation as an Eligible Telecommunications Carrier (“ETC”) and will continue for a term no less than twenty four (24) months from the date that the approval order becomes effective.

BACKGROUND

Global Connection, Inc. of America (“Global Connection”, the “Company”) is a Georgia Corporation² and is authorized to conduct business as a foreign corporation in the State of South Carolina. Global Connection was granted a Certificate of Public Convenience and Necessity to Provide Competitive Local Exchange Telecommunications Services within the State of South Carolina pursuant to Order No. 2000-580 issued in Docket No. 2000-149-C on July 19, 2000. The Company’s principle office is located at 5555 Oakbrook Parkway, Suite 620, Norcross, GA 30093. Information regarding the pricing and availability of the services offered by Global Connection can be found on the Company’s website at www.globalconnectioninc.com.

Global Connection provides local exchange and exchange access service in the AT&T Southeast (f/k/a Bellsouth) exchanges of South Carolina using a combination of resale and unbundled network elements (UNEs) or unbundled network element equivalents obtained through agreements with the underlying carrier. These agreements allow the Company to provide end-to-end switching and delivery of calls.

ADVERTISING AND OUTREACH PLAN

The Advertising and Outreach Plan of the Company is structured to promote maximum visibility of the Lifeline and Link Up programs throughout the State of South Carolina. Global Connection will use advertising mediums that have a proven track record of effectively identifying, informing, and educating current and potential subscribers of the Lifeline and Link Up programs thereby increasing consumer awareness and the overall penetration of Lifeline and Link Up subscribership in South Carolina. The Company will begin implementation of its Advertising and Outreach Plan throughout the AT&T Southeast exchanges in the State of South Carolina upon designation as an ETC, which will continue for a period of no less than 24 months.

¹ CFR 47 § 54.405(b)

² Global Connection was incorporated in the State of Georgia on June 1, 1998.

I. Advertising and Outreach to Existing Customer Base

Upon designation as an Eligible Telecommunications Carrier (“ETC”) in the State of South Carolina, Global Connection will implement its Advertising Plan by contacting the Company’s existing customer base.

This goal of this phase of the Advertising Plan will be two-fold. The first goal is to inform existing customers not only of the availability of Lifeline and Link Up, but also of the savings that eligible consumers can anticipate.

The second goal is to educate customers as to the eligibility requirements for participation in the Lifeline and Link Up programs.

To accomplish these goals, Global Connection will utilize USACs Consumer Outreach Lifeline and Link Up letter, a copy of this which is included with this Plan and is labeled as Attachment 1. A copy of this notification will be included by the Company as a billing insert. Approximately 30 days after the billing insert has been sent, Global Connection will send a stand-alone notice of the same, via U.S. mail, to each active non-responding customer.

Approximately 60 days after the billing insert has been sent, the Company’s customer service representatives will begin contacting customers who have not responded to either mailing in an effort to make the existence of and the eligibility requirements for this vital low-income program known.

Global Connection anticipates that the expected implementation period for this phase of the Company’s Advertising Plan will take approximately three (3) months.

II. Advertising and Outreach to New Customers

A. Web Based

In conjunction with the advertising and outreach effort, directed at the Company’s existing customer base, Global Connection will post company-specific Lifeline and Link Up information on its corporate website as well as on USACs Low Income consumer website, which is located at www.lifelinesupport.org.

This will provide information about Lifeline and Link Up and will educate potential subscribers as to the availability of and eligibility requirements for participation in the Lifeline and Link Up programs offered by Global Connection.

B. Governmental Agencies

Global Connection will coordinate its outreach efforts with and provide advertising materials to governmental agencies and other organizations that administer relevant governmental assistance programs and cater to those likely to qualify for support. Currently, the Company's advertising plans call for it to coordinate advertising and outreach efforts with organizations such as:

Social Service Agencies
Community Centers
Local Counsel on Aging Centers
United Way
AARP

Implementation of this phase will begin upon completion of the Company's Outreach to its existing customer base and will be ongoing in nature. Global Connection expects that it will take approximately twelve (12) months to make outreach materials fully available throughout the designated service area.

C. Print Media

Global Connection will begin print advertising using a media of general distribution. Specifically, the Company will begin by advertising the availability of Lifeline and Link Up in the designated area through free publications such as the Dollar Saver and Thrifty Nickel. These publications, and others like it, are available without cost or subscription requirements and are widely distributed throughout the State of South Carolina. As such, Global Connection believes that this form of advertisement to not only be effective but is consistent with the requirements of §54.405 and 54.411, which require ETCs to publicize the availability of Lifeline and Link Up service in a manner reasonable designed to reach those likely to qualify for the support.

Implementation will begin upon completion of the Company's Governmental Outreach campaign and will take approximately six (6) months to fully implement in all of the designated service area. Once in place, Global Connection will continue its print media advertisement on an ongoing basis.

D. Broadcast Media

Global Connection will implement a brisk and consistent broadcast advertising campaign throughout South Carolina. Implementation of this phase of the Company's advertising and outreach campaign will commence with advertising on broadcast TV stations in lieu of cable TV due to the lack of low-income viewership.

Current broadcast plans call for the Company to begin advertising on broadcast TV stations throughout the State of South Carolina. In addition, the Company will specifically target stations with affiliate TV and Radio stations.

Implementation will begin upon completion of the Company's Print Media Campaign. Global Connection anticipates that it will take approximately six (6) months to fully implement its Broadcast Outreach in all of the designated service area. Like the Company's print media campaign, Global Connection anticipates that its broadcast advertising campaign will continue unabated.

III. Qualification and Enrollment

Lifeline is a program that provides eligible consumers with a monthly recurring discount, off of the rate for basic local exchange service, of up to \$13.50.

Link Up provides eligible consumers with a 50%, up to \$30.00, off of the cost associated with connecting local exchange service.

Consumers are eligible for Lifeline and Link Up support if they participate in one of the following State approved needs-based programs:

- Food Stamps
- Medicaid
- Family Independence (TANF)

Global Connection has developed a compliance manual, which provides detailed information of the specific requirements for eligibility in Lifeline and Link Up on a state-by-state basis.

All advertising and outreach materials will direct consumers to call Global Connection at toll free 877-511-3009. The Company's customer service representatives will assist consumers to determine if they are eligible for Lifeline and Link up benefits. When a customer is deemed eligible, representatives will send, by fax, email, or U.S. mail, a copy of the Company's self-certification form. This form allows customers to self-certify, under penalty of perjury, that they meet the need-based eligibility requirements of the State. In addition, Global Connection requires all customers to provide documentation of proof of eligibility, which can be in the form of a copy of the customer's Medicaid card, Food Stamp card, or certification from the appropriate State Department. Eligible customer accounts will be enrolled in Lifeline and applicable Lifeline and Link Up credits will be provided after proof of eligibility has been received by the Company.

IV. Verification of Continued Eligibility

The FCC has recommended that all states, including federal default states, be required to establish procedures to verify a consumers' continued eligibility in the Lifeline program under Program Based or Income Based Eligibility criteria, which could include, but would not necessarily be limited to, random beneficiary audits, periodic submission of documents, or annual self-certification. However, to date, no clear-cut method of verification has been established. For example, in some states, the ETC is responsible for verifying the consumer's continued eligibility, while other states require their state agencies to devise procedures for eligibility verification. Still another state establishes eligibility verification procedures that involve state agency and carrier participation.

As such, Global Connection has elected to follow the FCC's recommendation that ETCs be required to verify annually the continued eligibility of a statistically valid sample of their Lifeline subscribers. Under this program, ETCs are free to verify directly with a state that particular subscribers continue to be eligible by virtue of participation in a qualifying program or Income level. Alternatively, to the extent ETCs cannot obtain the necessary information from the state, they may survey the subscriber directly and provide the results of the sample to USAC.

Subscribers who are subject to this form of verification and who qualify under Program Based Eligibility criteria must prove their continued eligibility by presenting in person or sending a copy of their Medicaid card or other Lifeline-qualifying public assistance card and self-certifying, under penalty of perjury, that they continue to participate in the Lifeline qualifying public assistance program.

Subscribers who are subject to this form of verification and who qualify under the Income Based Eligibility criteria must prove their continued eligibility by presenting current documentation consistent with the federal default certification process. These subscribers must also self-certify, under penalty of perjury, the number of individuals in their household and that the documentation presented accurately represents their annual household income.

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EXHIBIT 2
LIFELINE TARIFF REVISIONS

SECTION 7 - LIFELINE

7.1 Eligibility

7.1.1 To be eligible for the Lifeline credit, a customer must be a current recipient of any one of the following low income assistance programs:

- A. Temporary Assistance to Needy Families (TANF), previously known as AFDC
- B. Food Stamps
- C. Medicaid

7.2 Certification

7.2.1 Proof of eligibility in any of the qualifying low income assistance programs should be provided by the eligible Lifeline subscriber to the Company at the time of application for service. Eligible Lifeline subscribers may enroll in the Lifeline program by signing a document certifying under penalty of perjury that the customer participates in one of the South Carolina Lifeline eligible programs and identifying the qualifying program. The lifeline credit will not be established until the Company has received such signed document. If the Customer requests installation prior to the Company's receipt of proof of eligibility, the requested service will be provided without the Lifeline credit. When eligibility documentation is provided subsequent to installation, the Lifeline credit will be provided on a going forward basis.

ISSUED DATE: November 13, 2009

EFFECTIVE DATE: November 18, 2009

By: Mark D. Gagne, President and CEO
5555 Oakbrook Parkway, Suite 620
Norcross, GA 30093

SECTION 7 – LIFELINE, CONT.**7.2 Certification, cont.**

- 7.2.2 The Company reserves the right to periodically audit its records, working in conjunction with the appropriate state agencies, for the purpose of determining continuing eligibility. Information obtained during such audit will be treated as confidential information to the extent required under State and Federal laws. The use or disclosure of information concerning enrollees will be limited to purposes directly connected with the administration of the Lifeline plan.
- 7.2.3 When a customer is determined to be ineligible as a result of an audit, the Company will contact the customer. If the customer cannot provide eligibility documentation within sixty (60) days, the Lifeline credit will be discontinued.
- 7.2.4 As a reseller providing Lifeline service from this tariff, the Company is responsible for determining proof of eligibility prior to requesting the service. As set forth in 47 C.F.R. S 417(a) and (b), a reseller must provide a certification, upon request to the Commission, the Administrator or the ILEC that it is complying with all FCC and applicable State requirements governing Lifeline/Link-Up programs, including certification and verification procedures. The Company is required to retain the required documentation for three (3) years and be able to produce the documentation to the Commission or its Administrator to demonstrate that they are providing discounted services only to qualified low-income customers.

Disclosure requirements described in 7.2.2 preceding are applicable to resellers of Lifeline service.

7.3 Rates & Charges**7.3.1 General**

- A. Lifeline is provided as a monthly credit on the eligible residential subscriber's access line bill for local service.
- B. Service charges are applicable for installing or changing Lifeline service.
- C. Link-Up connection assistance may be available for installing or relocating Lifeline service.
- D. The secondary service charge is not applicable when existing service is converted intact to Lifeline service.

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SECTION 7 – LIFELINE, CONT.**7.3 Rates and Charges, cont.**

7.3.2 The total Lifeline credit consists of one federal credit plus one Company credit.

A.	Federal Credit	Monthly
1.	Temporary Assistance to Needy Families (TANF)	\$ 10.00
2.	Food Stamps	\$ 10.00
3.	Medicaid	\$ 10.00
B.	Company Credit	
1.	One per Lifeline service	\$ 3.50

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SECTION 8 – LINK-UP**8.1 General**

- A. Link-Up is a program designed to increase the availability of telecommunications service to low income subscribers by providing a credit to the non-recurring installation and service charges to qualifying low income residential subscribers. Basic terms and conditions are in compliance with the FCC's Order on Universal Service in CC Docket 97-157, which adopts the Federal-State Joint Board's recommendation in CC Docket 96-45, which complies with the Telecommunications Act of 1996. Specific terms and conditions are as prescribed by the South Carolina Public Service Commission and are as set forth in this tariff.
- B. Link-Up is supported by the federal universal service support mechanism.
- C. A federal credit amount of fifty percent (50%) of the non-recurring charges for connection of service, up to a maximum of thirty dollars (\$30.00), is available to be passed through to the subscriber.

8.2 Regulations**8.2.1 General**

- A. Customers eligible under Link-Up are also eligible for monthly recurring assistance under the Lifeline program.
- B. Link-Up connection assistance is available per household and is applicable to the primary residential connection only.
- C. The Link-Up credit is available each time the customer installs or relocates the primary residential service.
- D. To receive the credit, proof of eligibility must be provided prior to installation of service.
- E. The total tariffed charges for connecting service, including service and other installation charges, are considered in the credit calculation.
- F. Link-Up service is exempt from the installation billing service fee.

8.2.2 Eligibility

- A. To be eligible for a Link-Up credit, the named subscriber must be a current recipient of any of the following law income assistance programs:
 - 1. Temporary Assistance to Needy Families (TANF), previously known as AFDC
 - 2. Food Stamps
 - 3. Medicaid

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SECTION 8 – LINK-UP, CONT.**8.2 Regulations, cont.****8.2.3 Certification**

- A. Proof of eligibility in any of the qualifying low income assistance programs should be provided by the eligible Link-Up subscriber to the Company at the time of application for service. Eligible Link-Up subscribers may enroll in the Link-Up program by signing a document certifying under penalty of perjury that the customer participates in one of the South Carolina Link-Up programs and identifying the qualifying program. The Link-Up credit will not be established until the Company has received such signed document. If the customer requests installation without proof of eligibility, the requested service will be provided without the Link-Up credit.
- B. The use of disclosure of information concerning enrollees will be limited to purposes directly connected with the administration of the Link-Up plan.
- C. As a reseller providing Link-Up service from this tariff, the Company is responsible for determining proof of eligibility prior to requesting service. As set forth in 47 C.F.R. S417(a) and (b), a reseller must provide a certification, upon request, to the Commission, the Administrator or the ILEC, that it is complying with all FCC and applicable State requirements governing Lifeline/Link-Up programs, including certification and verification procedures. The Company is required to retain the required documentation for three (3) years and be able to produce the documentation to the Commission or its Administrator to demonstrate that they are providing discounted services only to qualified low-income customers. Disclosure requirements described in 8.2.3(B) preceding are applicable to resellers of Link-Up service.

8.3 Rates and Charges

The federal credit available for a Link-Up connection is thirty dollars (\$30.00) maximum or fifty percent (50%) of the installation and service charges from this Tariff, whichever is less.

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EXHIBIT 3
DESIGNATED WIRE CENTERS

AT&T Areas

AIKNSCMA64E	CLMASCSU78E	JONNSCESRS1	UNINSCMA42E
ALDLSCMARS1	CLMASCSW79E	LATTSCLSRS1	WCLMSCMARS1
ARSNSCAHRS1	CLSNSCMA65E	LBRTSCMARS1	WHTMSCMARS1
ARSNSCMA22F	CLTNSCMA83E	LKVWSCMARS1	WLHLSCESRS2
ARSNSCTVRS1	CLVRSCESRS1	LKWLS CRSRS1	WMNSSCESRS1
BATHSCMARS1	CMDNSCLGRS2	LYMNSCES43E	WMTNSCPW84F
BAVLSCMARS1	CMDNSCMA43F	LYMN SCIP433	YORKSCMA68F
BETNSCMA33E	CWPNSCMARS1	MARNSCBNRS1	
BEVLSCMA47E	DLLNSCMA77E	MARNSCMA42E	
BHISSCMARS1	DNMKSCESRS1	MCCLSCMARS1	
BLBGSCMARS1	DRTNSCMA39F	MLNSSCWP46E	
BLNHSCMARS1	EDBHSCMARS1	MNPLSCES88F	
BLRGSCMARS2	EDFDSCMARS1	MRTTSCMARS1	
BMBRSCMARS1	EOVRSCMARS1	NAGSSCMA27E	
BRWLSCBERS1	ESLYSCMA85E	NWBYSCMA27E	
BTBGSCMA53E	FLBHSCMARS1	NWELSCMARS1	
CENTSCWSRS1	FLRNSCMA60T	ORBGSCMA53E	
CHAPSCCLRS2	FLRNSCMA66F	PCKNSCES87E	
CHRWSCES53E	FNINSCES86F	PCLTSCMARS1	
CHTNSCBE5MD	FNVLSCMARS1	PDMTSCESRS1	
CHTNSCDP82E	GBSNNCMARS0	PNTNSCMARS1	
CHTNSCDT60T	GFNYSCMA48F	PRSRSCMARS1	
CHTNSCDT72E	GIVLSCMARS2	RWLDNCMARS0	
CHTNSCJM79E	GNVLSCBE24E	SALMSCMARS1	
CHTNSCJN55E	GNVLSCCH24E	SBRKSCSKRS1	
CHTNSCLB55E	GNVLSCCR27E	SCHLSCESRS1	
CHTNSCNO74F	GNVLSCDT23F	SENCSCMA88E	
CHTNSCWA85E	GNVLSCDT60T	SHRNSCMARS1	
CLIOSCMARS1	GNVLSCWE26E	SPBGSCBS57E	
CLMASCAR75E	GNVLSCWPRS1	SPBGSCCV57E	
CLMASCBQRS1	GNVLSCWR28F	SPBGSCHW50E	
CLMASCC78E	GRERSCMA87F	SPBGSCMA57E	
CLMASCDF78E	GRVRNCMARS0	SPBGSCWV57E	
CLMASCPARS1	GSTANCSO85G	SPFDSCMARS1	
CLMASCSA77E	HCGVSCMARS1	STGRSCMARS1	
CLMASCS CRS2	HNP HSCMARS1	SUVLSCMA87E	
CLMASCSH77E	HTVLSCMA33E	SXMLSCMARS1	
CLMASCSN25E	ISPLSCISRS1	TKNASCSTRS1	
CLMASCSN60T	JHTNSCMARS1	TMVLSCMARS1	
CLMASCSN79F	JNVLSCMARS1	TRRSSCMARS2	

Verizon Areas

ABVLSCXADS0	BWMNSCXADS0
ANDRSCXADS0	ELLRSCXARS0
BSVLSCXARS3	JCSNSCXADS1
CLFLSCXADS0	SANTSCXARS0
CNWYSCXA24E	SSVLSCXADS0
EHRHSCXA26E	
FRFXSCXADS0	
GRTWSCXADS0	
GRTWSCXARL0	
HLWDSCXADS1	
HMNGSCXADS0	
JSVLSCXADS0	
KGTRSCXADS0	
LAMRSCXA32E	
LKCYSCXA39A	
LRNSSCXCD0	
MCCRSCXBDS0	
MNNGSCXARS1	
MYBHSCAF1JB	
MYBHSCAFDS0	
MYBHSCXB44E	
MYBHSCXC23E	
MYBHSCXM44E	
ODBHSCXBR0	
OLARSCXARS0	
OLNTSCXARS0	
PMPLSCXADS0	
PWISSCXARS0	
SHHGSCXB66E	
SMTNSCXARS2	
SMTRSCXA77E	
WDRFSCXARS0	
WLBOSCXCD0	
WNBOSCXADS0	
WNHLSCXADS0	
YMSSSCXADS0	

Embarq Areas

PTVLSCXA2MD
BHVLSCXARS0
BUFTSCXADS0
CHPLSCXARS0
CRHLSCXARS0
ESTLSCXADS0
ETVLSCXARS0
GNWDSCXBRS0
GNWDSCXCDS0
HDGSSCXARS0
HLHLSCXADS0
HMPNSCXADS0
LRBYSCXARS0
LWCNSCAAL01
MTVLSCXARS0
NTSXSCXARS0
RDLSCXARS0
SALDSCXADS0
STHLSCXARS0
TROYSCXARS0
WRSHSCXARS0

Windstream Areas

CMPBSCXARS1
CMRNSCXARS1
INMNSCXADS1
KRSHSCXB47E
LNDRSCXA45E
LXTNSCXBR50
LXTNSCX35A
STMTSCXADS0

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EXHIBIT 4
CERTIFICATION AFFIDAVIT

**PUBLIC SERVICE COMMISSION
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AFFIDAVIT OF MARK R. ELLIS

Personally appeared before me Mark R Ellis, who, being first duly sworn, deposes and states the following:

1. My name is Mark R Ellis. I am employed by Global Connection Inc. of America as CEO. My business address is 5555 Oakbrook Parkway, Suite 620, Norcross, Georgia 30093. I am an officer of the Company and am authorized to make this Affidavit on its behalf, and it is based on my personal knowledge. This affidavit is given in support of the application to be designated as an eligible telecommunications carrier.

2. On behalf of Global Connection, I certify and assert the following:

- a. Global Connection will provide Lifeline and Link-up service in a timely manner throughout the designated service area upon reasonable request of an eligible customer;
- b. Global Connection acknowledges that the Federal Communications Commission may require Global Connection to provide equal access to long distance carriers in the event that no other eligible telecommunications carrier is providing equal access within the service area;
- c. Global Connection will offer the services that are supported by the federal universal service support mechanisms by using its own facilities or a combination of its own facilities and resale of another carrier's services;

d. Global Connections will advertize in a media of general distribution the availability of such services, including lifeline services and the applicable charges; and

e. Global Connection will provide service within a reasonable period of time, if the potential customer is within its licensed service area but outside its existing network coverage, if service can be provided at reasonable costs.

Dated this 17 day of February, 2010.

Global Connection Inc. of America


Mark R Ellis, CEO

SUBSCRIBED and sworn to before me
this 17th day of February, 2010.


Notary Public for Georgia

My Commission Expires: **ANGELA C BRIGGS**
Notary Public, Gwinnett County, Ga
My Commission Expires December 3, 2013